

**UNITED STATES DISTRICT COURT  
DISTRICT OF RHODE ISLAND**

\_\_\_\_\_) )  
CAROLYN RAFAELIAN, an individual, ALEX )  
AND ANI PLEDGE CO., a Rhode Island )  
Corporation and VENICE BEACH WALK, LLC,) )  
a California Limited Liability Company, )

**Case No.: 1:20-CV-00247-MSM-PAS**

Plaintiffs, )

v. )

\_\_\_\_\_) )  
LC A&A HOLDINGS, INC., a Delaware )  
Corporation, LC A&A INTERMEDIATE )  
INVESTORS, LLC, a Delaware limited liability )  
Company, LYNDON LEA, an individual, )  
A and A SHAREHOLDING CO., LLC, )  
a Delaware limited liability company and )  
ROBERT TRABUCCO, an individual, )

Defendants. )  
\_\_\_\_\_)

**NOTICE OF VOLUNTARY DISMISSAL WITH PREJUDICE**

Pursuant to Rule 41(a)(1)(A) of the Federal Rules of Civil Procedure, Plaintiffs hereby give notice that the above-captioned action is voluntarily dismissed, with prejudice, as to all Defendants, each party to bear her, his or its own costs.

Respectfully submitted,

**KALBERER LLP**

By: /s/ Kurt T. Kalberer II

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Alex & Ani Pledge Co. and Venice Beach  
Walk, LLC*

Dated: September 22, 2021

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on September 22, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification to all counsel of record and paper copies were sent to those indicated as non-registered participants.

/s/ Kurt T. Kalberer II

Kurt T. Kalberer II